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July 10, 2017

VIA EMAIL AND ECF

The Honorable Shelley C. Chapman
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004

Re: *In re Lehman Brothers Holdings Inc., et al.*, Ch. 11 Case No. 08-13555 (SCC)

Dear Judge Chapman:

On behalf of Lehman Brothers Holdings Inc. and the RMBS Trustees (together with Lehman Brothers Holdings Inc., the “Parties”), we write to inform the Court that the Parties have agreed to modify the expert discovery deadlines, set forth in Exhibit G of the RMBS Settlement Agreement, as follows:

| Event | Original Date | Modified Date |
|--|------------------------------|--|
| Simultaneous exchange of Rebuttal Reports, the Parties to identify exemplar loans to be used by their rebuttal experts, and the RMBS Trustees to identify such settlements that they intend to use in their Expert Reports | Friday, July 14, 2017 | Thursday, July 27, 2017 |
| Simultaneous exchange of Reply Reports with any additional exemplar loans | Monday, August 21, 2017 | Monday, August 28, 2017¹ |
| Completion of Expert Depositions | Thursday, September 21, 2017 | Friday, September 29, 2017 |

¹ The Parties will provide copies of all expert reports to the Court within three days after the exchange of reply reports, or by Thursday, August 31, 2017.

The Parties have not agreed to modify any of the other deadlines established by Exhibit G, including the date of the Estimation Hearing.

Respectfully submitted,



Todd G. Cosenza

Counsel for Lehman Brothers Holdings Inc.

/s/Michael S. Shuster

Michael S. Shuster

Counsel for RMBS Trustees

cc: All counsel (*via* email)